

**Kenneth A. Plevan
Limor Robinson
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
(212) 735-3000**

Attorneys for Plaintiff Citigroup Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CITIGROUP INC.,	:	
	:	
Plaintiff,	:	08 Civ. 7527 (SHS) (RLE)
	:	
- against -	:	
	:	
VDN SYSTEMS, INC.;	:	
CITI.NET, INC.; and	:	
TRUC V. TRAN,	:	
	:	
Defendants.	:	
	:	
-----	:	x

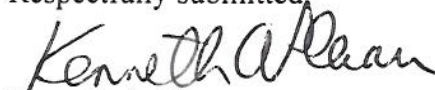
NOTICE OF FILING OF REGISTRAR CERTIFICATE

Plaintiff, Citigroup Inc., by its attorneys Skadden, Arps, Slate, Meagher & Flom LLP, pursuant to 15 U.S.C. § 1125(d), the Anticybersquatting Consumer Protection Act, hereby gives notice that it has filed with the Court the Registrar Certificate for the domain name Citi.net issued by Network Solutions, LLC (see attached letter dated August 27, 2008 and Registrar Certificate verified on August 27, 2008).

Citigroup Inc. further gives notice that with the filing of this Registrar Certificate Network Solutions, LLC states that it has tendered "to the Court complete control and authority over the registration for the Citi.net domain name registration record."

Dated: New York, New York
August 29, 2008

Respectfully submitted,



Kenneth A. Plevan

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Limor Robinson

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SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

Four Times Square

New York, New York 10036-6522

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Attorneys for Plaintiff Citigroup Inc.

To:

VDN Systems, Inc.
8300 Boone Boulevard
Suite 500
Vienna, Virginia 22182

Citi.net, Inc.
8300 Boone Boulevard
Suite 500
Vienna, Virginia 22182

Truc V Tran
8150 Leesburg Pike
Suite 400
Vienna, Virginia 22182



13661 Sunrise Valley Dr.
Herndon, Virginia 20171

August 27, 2008

VIA EXPRESS MAIL

Kenneth A. Plevan
Four Times Square
New York, New York 10036-6522

Re: Citi.net

Dear Kenneth A. Plevan:

I am a Paralegal with Network Solutions, LLC ("Network Solutions"). I acknowledge receipt of a file-stamped copy of your pending lawsuit concerning the above-identified domain name.

Network Solutions is merely the registrar of one or more of the disputed domain name registrations and will not be participating in this case as a party. As envisioned by 15 U.S.C. §§1112(D)(i)(II)(aa), 1125(d)(2)(C)(ii), 1125(d)(2)(D)(i)(I), and as further provided in Network Solutions' standard service agreement with its registrants and the dispute policy incorporated therein, I have enclosed the original Registrar Certificate for your deposit with the Court. By this certificate, Network Solutions deposits (through you) complete authority and control over the disputed domain name registration with the registry of the Court. As a nonparty to the suit, we cannot deposit the Registrar Certificate directly. A party must deposit it in the proceedings, sometimes by motion, depending upon the Court. Please note that this Registrar Certificate in no way reflects any position of Network Solutions with regard to the merits of the dispute one way or another.

By this letter, we further notify you and the domain name registrant that, in accordance with 15 U.S.C. §§1114(D)(i)(II)(bb), 1125(d)(2)(D)(i)(II), the disputed domain name registration will not be transferred, suspended, or otherwise modified during the pendency of the action, except upon order of the court. The domain name registrant already understands and has agreed to the maintenance of the status quo through its agreement to paragraph 7 of the Uniform Domain Name Dispute Resolution Policy. Any requests for modifications to the subject domain name registration record, including changes to the host servers designated for the domain name, should therefore be addressed to and approved by the Court.

Registrar Certificate – citi.net

Date: 08/27/2008

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Finally, note that the enclosed Registrar Certificate is valid for only 14 calendar days from the date of the certificate unless it is filed with the Court by the end of the fourteenth day. If you file the certificate within this 14-day period, the certificate will remain valid throughout the pendency of any claims concerning the registrant's contractual rights to register or use the subject domain name. If you do not file the certificate within this 14-day period, it shall become null and void.

Please send a file-stamped copy of the Registrar Certificate, as well as any court order relating to the disputed domain name registration, to:

Network Solutions, LLC
Attention: John David
Paralegal, Legal Department
13861 Sunrise Valley Dr.
Herndon, VA 20171
US

By a copy of this letter to each of the defendants, Network Solutions is providing them with a copy of the Registrar Certificate and asking them to direct any questions regarding the complaint to:

Skadden, Arps, Slate, Meagher & Flom LLP
Attention: Kenneth A. Plevan
Four Times Square
New York, New York 10036-6522

You can reach me most conveniently if you have questions concerning the registrar certificate at the following telephone number listed below.

Sincerely,

A handwritten signature in black ink, appearing to be 'JD' with a flourish at the end.

John David
Paralegal, Legal Department
Network Solutions, LLC
13861 Sunrise Valley Dr.
Herndon, VA 20171
703.668.5011

Enclosures: Registrar Certificate

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CITIGROUP INC,

CASE NO. 08 CIV 7527

Plaintiff,

v.

VDN SYSTEMS, INC.;
CITI.NET, INC; AND
TRUC V. TRAN,

Defendant.

REGISTRAR CERTIFICATE

I, John David, pursuant to 15 U.S.C. §§ 1114(2)(D) (i)(II)(aa) and 1125(d)(2)(D)(i)(I), and 28 U.S.C. § 1746 hereby declare:

1. I have personal knowledge of the facts stated in this Registrar Certificate, and could and would testify to these facts if called as a witness in this matter. I am a Paralegal in the Legal Department of Network Solutions, LLC. ("Network Solutions").

2. Network Solutions is a registrar of Internet second-level domain names in the top-level domains .COM, .NET, and .ORG located in Herndon, Virginia.

3. Our records indicate that the registrant of the Citi.com domain name is CITI.NET, Inc. of P.O. BOX 3088, Merrifield, Virginia 22116-3088.

4. Through the deposit of this Registrar Certificate with

1 the Registry of the Court, Network Solutions hereby tenders to
2 the Court complete control and authority over the registration
3 for the Citi.net domain name registration record.

4 5. The registration for the domain name Citi.net is
5 currently active, and Network Solutions will not permit any
6 transfer, suspension, or other modification to the
7 registration record during the pendency of this action, except
8 upon receipt of an order of the court or a dismissal of all
9 claims concerning the registrant's contractual rights to
10 register or use the subject domain name.

11 12 6. This Registrar Certificate shall expire automatically,
13 and control and authority over the registration record of the
14 domain name shall revert to Network Solutions: (i) 14 calendar
15 days from the date of this Registrar Certificate, unless this
16 Registrar Certificate has been filed with the Court during
17 that period and Network Solutions has received a file-stamped
18 copy; or (ii) upon Network Solutions' receipt of an order
19 dismissing all claims concerning the registrant's contractual
20 rights to register or use the subject domain name.

21 22 7. By tendering this Registrar Certificate, Network
23 Solutions takes no position as to the legal status of the
24 domain name registration which is the subject of this action
25 or the merits of the instant action, nor should this
certificate or its submission be construed as such.

1 I declare under penalty of perjury that the foregoing is
2 true and correct. Executed on August 27, 2008, at Herndon,
3 Virginia.

4 

5 John David
6 Paralegal, Legal Department
7 Network Solutions, LLC.

8
9 The foregoing instrument was signed before me
10 this 27 day of August, 2008, by John David

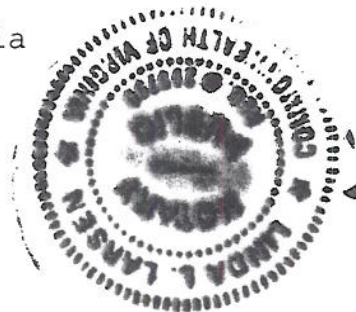
11 

12 Notary Public

13 **Linda L. Larsen - Notary Public**
14 **Commonwealth of Virginia**
15 **Registration No. 298759**
16 **My Commission Expires 05.31.2012**

17 My commission expires:

18 County of Fairfax, Commonwealth of Virginia



CERTIFICATE OF SERVICE

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on August 29, 2008, I caused a true copy of the *Notice of Filing of Registrar Certificate* to be served upon the following parties as indicated:

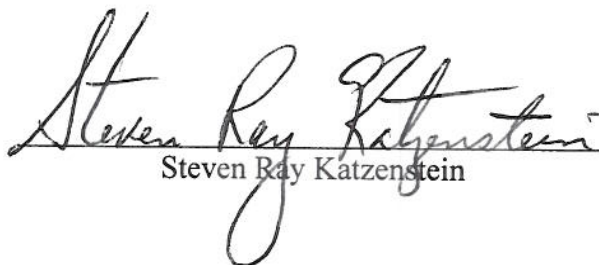
By First Class Mail

Truc V. Tran
8150 Leesburg Pike, Suite 400
Vienna, Virginia 22182

Citi.net, Inc.
8150 Leesburg Pike, Suite 400
Vienna, Virginia 22182

VDN Systems, Inc.
8150 Leesburg Pike, Suite 400
Vienna, Virginia 22182

Dated: New York, New York
August 29, 2008


Steven Ray Katzenstein